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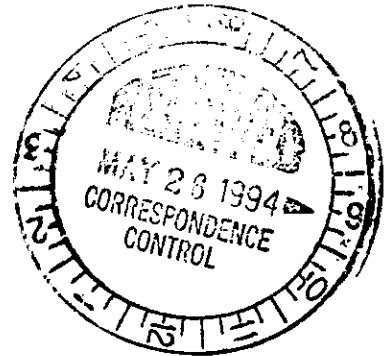
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 18, 1994

Ms. June M. Hennig, Director
Waste Management Division
U. S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Ms. Hennig:

Re: Miscellaneous Streams Plan and Schedule (DOE/RL-93-94, Rev. 0) 003414-1

We received the *Plan and Schedule for Disposition and Regulatory Compliance for Miscellaneous Streams* (DOE/RL-93-94, Rev. 0) and the inventory of Miscellaneous Streams. We have also met with the U.S. Department of Energy (USDOE) and Westinghouse Hanford Company (WHC) staff to discuss the plan and schedule and its implementation.

This plan is not approved as written. The plan must be revised to address the following major points:

- A petition for a general permit under Washington Administrative Code (WAC) 173-226 will not be approved because a general permit is not appropriate for the Hanford Site. The general permit is designed to permit a class of dischargers across the state, not to permit a class of discharges under the control of a single owner. The streams which would have been included in the proposed general permit must be included in state waste discharge permits under WAC 173-216. A permit will be written for each class of discharge that will cover those discharges across the site. These permits will be similar to a general permit.
- Current regulations do not provide for de minimus criteria. Streams which would have been eliminated from permitting under USDOE's plan must be included in one of the permits issued under WAC 173-216.
- Some of the streams listed on the qualitative inventory must be permitted. The permitting of these streams is not addressed in the plan and schedule.

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- A few of the streams were identified as contaminated or discharging to contaminated sites. Ecology considers the elimination, treatment or rerouting of these streams to be a priority. Although the remainder of the plan will not be implemented until it is approved by Ecology, Ecology requests that USDOE begin the process to eliminate these streams immediately. USDOE's plan states these streams can be eliminated within 24 months of approval of the plan (last item, Table 6-1, page 16). Therefore, Ecology requests that USDOE eliminate these streams by May 1996, or sooner, if possible.

Specific comments are attached. If you or your staff have any questions regarding this letter, please contact me at 736-3021. I will be happy to work with your staff on the revisions to the plan and schedule so that we can avoid a protracted review cycle.

Sincerely,



Melodie A. Selby, PE
Nuclear and Mixed Waste Management Program

MS:sr
Enclosure

cc: Marv Furman, USDOE
Becky Austin, WHC
Tony DiLiberto, WHC
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Subject: MISCELLANEOUS STREAMS PLAN AND SCHEDULE (DOE/RL-93-94, REV. 0)

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